

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re)
) Case No. 09-43138
Michael and Janet Estes,) Chapter 13
)
Debtor(s).)

**DEBTORS' REPLY TO TRUSTEE'S RESPONSE TO MOTION TO RETAIN
SETTLEMENT PROCEEDS**

COME NOW Debtors, Michael and Janet Estes, in the above-captioned case, by and through their attorney, Susan E. Skelton, and for their Reply to Trustee's Response to their Motion to Retain Settlement Proceeds, state as follows:

1. Per the letter from Debtors' personal injury attorney, recently forwarded to the Trustee's office, the post-petition medical costs that Debtors seek to use a portion of their settlement funds to pay are for medical expenses not covered by the settlement previously; most medical costs are for a medical issue unrelated to the accident and Debtors have been making minimal monthly payments on as they are continuously incurred.
2. Debtors' 2005 Ford Explorer was obtained post-petition to replace the 2005 Monte Carlos that was totaled in the accident related to the personal injury claim. The 2005 Monte Carlos was listed on Schedule B, along with a Chevy Avalanche, which has not been in running condition for several years and Debtors were unable to afford to fix it. Mr. Estes drives the HHR to and from work and Mrs. Estes currently drives the Ford Explorer.
3. Debtors need two running vehicles, as they are self-employed as janitors and work at separate facilities on several occasions, sometimes late nights and more than 20 miles apart.

WHEREFORE, Debtors request an order from the Court permitting the retention of the \$17,499.63 from Mrs. Estes' insurance settlement from her personal injury for the expenses described in their previous Motion, and such other order which the Court may find to be just.

Dated: October 13, 2013

Respectfully Submitted,

/s/ Susan E. Skelton

Susan E. Skelton

MBE #55027, USED #55027MO

Skelton Law Firm

2702 Macklind Ave., First Floor

St. Louis, MO 63139

Phone: (314) 276-2941

Fax: (314) 802-8327

Email: susaneskelton@gmail.com

Attorney for Debtors

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served electronically by the ECF System or by First Class Mail, postage prepaid, this October 13, 2013 to the following:

John V. LaBarge, Jr.
Chapter 13 Trustee
P.O. Box 430908
St. Louis, MO 63143

Bank of America
475 Crosspoint Parkway
Getzville, NY 14068

Bank of America
4161 Piedmont Parkway
Greensboro, NC 27410-8110

Bank Of America
PO Box 9000
Getzville, NY 14068

Chase
800 Brooksedge Blvd
Westerville, OH 43081

Cit of St. Louis
Gregory FX Daly
PO Box 66787
Saint Louis, MO 63166-6787

Citi Flex
PO Box 6241

Sioux Falls, SD 57117

Collector of Revenue
41 South Central
Attn: Division of Collection
Saint Louis, MO 63105

CPU/CBSD
PO Box 6497
Sioux Falls, SD 57117

Fashion Bug/SOANB
1103 Allen Dr
Milford, OH 45150

GEMB/JCP
PO Box 981131
El Paso, TX 79998

GEMB/Sams Club
PO Box 981064
El Paso, TX 79998

GEMB/Walmart
PO Box 981400
El Paso, TX 79998

GMAC

PO Box 2150
Greeley, CO 80632

HSBC/VLCTY
PO Box 15524
Wilmington, DE 19850

Internal Revenue Service
Attention: Bankruptcy Unit
PO Box 21126
Philadelphia, PA 19114-0326

MCYDSNB
9111 Duke Blvd
Mason, OH 45040

Missouri Department of Revenue
Attn: Bankruptcy Unit
P.O. Box 475
Jefferson City, MO 65105

Sears/CBSD
PO Box 6189
Sioux Falls, SD 57117

US Bank/NA ND
PO Box 108
Saint Louis, MO 63166

/s/ Susan E. Skelton